

Department of Engineering & Planning

IV.D. Narrative Information Sheet

1. Applicant Identification:

City of Greenfield 10 S. State Street Greenfield, Indiana 46140

2. Funding Requested:

- a. Assessment Grant Type: Community-wide
- b. Federal Funds Requested:
 - i. \$300,000
 - ii. We are not requesting a Site-specific Assessment Grant waiver of the \$200,000 limit.
- c. Contamination: Hazardous Substances (\$180,000) and Petroleum (\$120,000)

3. Location:

- a. City of Greenfield
- b. Hancock County
- c. Indiana
- 4. Property Information for Site-Specific Proposals: Not applicable

5. Contacts:

a. Project Director:

Ms. Joanie Fitzwater Planning Director 317-325-1329

jfitzwater@greenfieldin.org

10 S. State Street

Greenfield, Indiana 46140

b. Chief Executive/Highest Ranking Elected Official:

Mayor Chuck Fewell 317-477-4300 <u>cfewell@greenfieldin.org</u> City Hall

10 S. State Street, Room 111

Greenfield, Indiana 46140

6. Population: City of Greenfield – 21,565 (2013-2017 American Community Survey (ACS) 5-Year Estimate)

7. Other Factors Checklist:

Other Factors	Page#
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or	
United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
The priority site(s) is adjacent to a body of water (i.e., the border of the	
priority site(s) is contiguous or partially contiguous to the body of water, or	Pg. 2,3
would be contiguous or partially contiguous with a body of water but for a	
street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	Pg. 2,3
The reuse of the priority site(s) will facilitate renewable energy from wind,	
solar, or geothermal energy; or will incorporate energy efficiency measures.	
30% or more of the overall project budget will be spent on eligible reuse	
planning activities for priority brownfield site(s) within the target area.	

¹Because Applicant is a municipality (similar to a county), population data is reported in census tracts in which each priority site is located.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue . Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb

Bruno L. Pigott

December 3, 2019

Ms. Joanie Fitzwater Planning Director City of Greenfield 10 S. State Street Greenfield, Indiana 46140

Re:

IDEM Acknowledgement Letter

U.S. EPA Brownfields Grant Proposal

Community-wide Assessment

Hazardous Substances and Petroleum

City of Greenfield

Hancock County, Indiana

Dear Ms. Fitzwater:

This letter is provided in support of the City of Greenfield's (City) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community-wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the City is applying for \$300,000 (\$175,000 for hazardous substances and \$125,000 for petroleum) to expand its existing brownfields inventory and to conduct environmental assessment activities systematically for at least five commercial/industrial properties in the target Census Tracts 4105 & 4104 in the updated inventory, prioritized on the basis of redevelopment potential, threats to human health and the environment, environmental justice and community input, with large-scale mixed redevelopment goals.

IDEM believes that the City of Greenfield has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and/or technical assistance offered by U.S. EPA and the Indiana Brownfields Program in the past. This assessment grant funding will help the City continue its effort to assess brownfields in the community. Should an opportunity arise for the City to need petroleum eligibility determinations or cleanup/closure assistance at any of the sites investigated with this grant funding, IDEM realizes that the City will participate in the Indiana Brownfields Program or the IDEM Voluntary Remediation Program accordingly.



IDEM Acknowledgement Letter U.S. EPA Brownfields Grant Proposal December 3, 2019 Page 2 of 2

Based on the information submitted, IDEM considers the City of Greenfield a good candidate to receive U.S. EPA grant funding to continue its brownfield redevelopment efforts, which support Indiana's brownfield initiative. IDEM is pleased to assist and looks forward to continuing its partnership with the City of Greenfield. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program at (317) 234-0235 or at moertel@ifa.in.gov.

Sincerely,

Bruce A. Oertel, Chief

Remediation Services Branch

Office of Land Quality

BAO/mmo

cc: (via electronic transmission)

Len Hinrichs, BCA Environmental Consultants, LLC

IV.E. NARATIVE/RANKING CRITERIA

IV.E.1 Project Area Description & Plans for Revitalization, a. Target Area & Brownfields, i. Background & Description of Target Area: The City of Greenfield (the City) is situated in east-central Indiana, approximately 14 miles east of Indianapolis along I-70, US 40, and State Road 9. Founded in 1828 as the Hancock County Seat (population 21,565) (2017 ACS 5-YR Estimates (2017 ACS)), it was incorporated in 1876. Located at the "Crossroads of America", our historic downtown is centered on US 40 (Old National Road) and State Road 9. Our proximity to I-70 and US 40 allows quick access to Indianapolis, Chicago, Louisville, Columbus, and Cincinnati.

The Pennsylvania Railroad historically ran parallel to US 40 and industry and commerce centered along this corridor (now the Pennsy Recreation Trail). Greenfield became a boom town with the founding of numerous manufacturing plants and industries, including glass factories, stove foundries, nail factories, and other businesses making bricks and steel. These businesses eventually diversified to support other industries, and with this growth, historic neighborhoods developed in Greenfield, allowing residents to live, work, and play near their homes.

However, as with much of the Midwest's "rust belt", our manufacturing base began to decline in the 1960s and 1970s, and due to the expanding population in nearby Indianapolis, Greenfield transitioned to a more suburban environment. Of the industries that survived, including automotive products, pharmaceutical manufacturing, animal health products, metal fastener manufacturing, furniture manufacturing, and distribution/warehousing, many chose to forego our city center for "greenfields" on the periphery near I-70 and along US 40, leaving our once thriving downtown industrial and commercial corridor in a state of decay. Company closures and reductions in force have especially hurt our local workforce in the last 5 years, including DHL Supply Chain which laid off 511 workers in May 2018, and Irwin Tools which laid off 79 workers in July 2014. Many of the businesses remaining in the downtown area have reduced their operations resulting in vacant or underutilized properties. Historic neighborhoods in and around our former downtown and rail corridor have been pulled down with this decline, leaving behind a community burdened with over 25 brownfields, neglect, and despair. Not coincidentally, this part of our downtown, the "Pennsy Trail Corridor", is where the majority of Greenfield's brownfields are, and we have selected it as our target area where EPA Brownfield Assessment Grant funding will have the greatest impact.

The **Pennsy Trail Corridor** (**PTC**) is approximately 0.3 mi² in size and is bounded by North St. to the north, Vine St. to the east, Virginia Ct. to the south, and Broadway St. to the west, and is made up of numerous commercial, municipal, and/or industrial properties located in low-income residential or mixed-use areas. It's high visibility as an extension of Greenfield's downtown along the Pennsy Recreation Trail, make the PTC a natural gateway to our community. Unfortunately, that gateway does not currently portray an appealing image due to the number of brownfields clustered there. The residents living among brownfields in the PTC experience high unemployment, low Median Household Income (MHI), high poverty rate, and high child poverty rate (see IV.E.2.a.i. for actual figures).

Even with such social and economic constraints, we recognize the great redevelopment potential of the PTC. We are working hard to repurpose and reshape the downtown businesses and commerce that have closed or moved away. Recent repurposing of the vacant former American Legion site along the Pennsy Trail into a Photon Automation, Inc. facility, currently with 18 employees and an \$18M expansion in progress (creating 15 more new jobs) confirm that Greenfield is striving to again be a place where people can live, work, play, and prosper. Greenfield was selected as a 2018 Stellar Designated "Health & Heritage" Region (details of the economic development benefits in IV.E.1.c.i).

Our Revitalization Plans (IV.E.1.b.i.) identify mixed use development, including commercial and light industrial employment; clean, safe, affordable housing; more park/recreational space; and improved walkability as the development goals for the target area. We have made a focused effort to invest in the PTC to address priority brownfields (IV.E.1.a.ii) and leverage additional funding for this depressed area of our community. If properties outside the target area become high priority during the cooperative agreement period, we may choose to invest some grant funding on them; however, our focus for this grant will remain the PTC.

<u>IV.E.1.a.ii.</u> <u>Description of the Priority Brownfield Site(s)</u>: The brownfields targeted for this grant are vacant or underutilized commercial and/or industrial properties (reflecting our industrial history) located in low-income residential and/or mixed-use areas of the PTC. Vacant properties such as the automotive

junk yard (adjoining Pott's Ditch and located in a federally-designated floodplain), grain elevator, former gas station, former towing yard, and power substation impact large portions of the PTC neighborhoods where they are located and threaten both the physical and financial wellbeing of the community. Developers are often hesitant to invest in property in the area because the risk of poor return on investment is too high. Funding from this EPA grant will reduce this risk by providing the initial investment stake for brownfield properties to both inform reluctant investors of the properties' environmental conditions and help them see and understand the investment potential of these properties. thereby catalyzing reinvestment in the target area. The brownfields targeted for this grant are vacant or underutilized commercial and/or industrial properties located in low-income residential and/or mixeduse areas of the PTC, and to date, over 25 brownfield properties have been identified and inventoried by the City. For example, the 219 S. Pennsylvania St. site is a former gas station located next to a City park and the Pennsy Trail. The environmental conditions of the site are unknown, adding to the already high health risk to adjoining neighborhoods from potential USTs, petroleum, solvents, and other industrial chemicals. The City has plans to repurpose this site into either mixed-use commercial/residential or a convention center, removing the environmental and health threats, and transforming it into a downtown meeting and commerce center, connected to Greenfield's growing trail and parks system for residents and non-residents alike to utilize (per Greenfield Revitalization Plans (IV.E.1.b.i.)).

The highest priority sites listed in Table 1 offer the greatest opportunity to trigger successful reuse and resurgence in this hard-hit corridor of our community. The historical uses of these priority sites, likely environmental issues, potential health effects to those exposed to these uncontrolled sites, and planned reuse are summarized below.

Table 1 – Priority Brownfield Sites and Impacts

10010 1 1	Honey Brownincia Sites and Impacts	
	Historic Use / Current Use & Condition /	
Priority Site, Size, Proximity to	Planned Reuse (further discussed	
Target Area Residents	in Section IV.E.1.b.i.)	Suspected Contaminants*
Jack's Junk Yard, 318 E South St. – 2.75 acres; adjoins residential neighborhood, Pott's Ditch, & Pennsy Trail; in Fed. Designated Floodplain Zone AE		PCBs, metals, petroleum, VOCs, SVOCs, asbestos, glycols
Grain Elevator, W Mill St. – 0.40 acres, adjoins Depot St. Park, & Pennsy Trail		PCBs, metals, petroleum, pesticides, herbicides, VOCs, PAHs, asbestos
Power Substation, 110 Riley Ave – 1.0 acre, adjoins residential neighborhood	Power substation / exposed electrical components / moderate income residential or mixed-reuse	PCBs, metals, VOCs, PAHs, asbestos
Depot Park – 1.27 acre, adjoins residential neighborhood & Pennsy Trail; 600" from preschool	Former rail depot / mostly vacant / downtown park & civic amphitheater	metals, PAHs (from coal ash & cinders)
Inman's Towing, 120 S Noble Street – 2.44 acres, adjoins residential neighborhood & Pennsy Trail	reuse	PCBs, metals, petroleum, VOCs, SVOCs, asbestos, glycols
Former Gas Station, 219 S. Pennsylvania Street – 0.34 acre, adjoins Depot St. Park, & Pennsy Trail		PCBs, metals, petroleum, VOCs, SVOCs, glycols
*According to the Agency for Toxic Substances of	and Disease Registry (ATSDR), the contaminar	nts listed in Table 1 pose a real

*According to the Agency for Toxic Substances and Disease Registry (ATSDR), the contaminants listed in Table 1 pose a real threat to human health. Health threats include: skin damage, liver, kidneys, heart, spleen, nervous, respiratory, hormonal, blood, and immune systems, and may also cause neurological damage, birth defects and cancer (<u>www.atsdr.cdc.gov</u>).

These sites are our highest priorities because they meet immediate needs in our community, align with our revitalization plans, and redevelopment is imminent due to funding already committed (\$6.75M has already been secured to redevelop residential/mixed-use commercial assets and a City park on properties in the target area (IV.E.1.c.i)). Increasing our low- to moderate income housing stock will help alleviate our housing shortage and aligns with our goal to increase the walkability of our downtown and connection to area neighborhoods. Once redeveloped, they will serve as examples of success, triggering more investment. With the EPA's grant funding the initial, high-risk due diligence investment on these sites, the likelihood of a successful revitalization is much higher.

IV.E.1.b. Revitalization of the Target Area, i. Reuse Strategy & Alignment with Revitalization Plans: Our 2013 Downtown Revitalization Plan, 2015 Comprehensive Plan, 2018 Downtown Capital Improvement Plan, 2018 Stellar Health & Heritage Regional Development Plan, and 2018-2019 Parks Master Plan (Greenfield Revitalization Plans) highlight revitalization of our downtown as a key initiative, providing infrastructure and amenities to improve our health outcomes and create an intrinsically

attractive environment to raise families and foster good paying jobs that will enable people to work and stay in our community. Our motto, "Experience our Past, Share our Future" means preserving historic structures, identity, and history of Greenfield while welcoming new residents and businesses with open arms, and continuing to develop in a methodical, logical way that capitalizes on existing assets and infrastructure. The key to our revitalization of the PTC/downtown is brownfields reuse/revitalization. The City is requesting \$300,000, the majority of which will be used to complete Phase I and Phase II ESAs in the PTC, providing the initial, highest risk investment necessary for brownfield reuse. Funding will also be committed to updating/prioritizing our existing inventory and conducting cleanup planning activities. These funds will help us reach reuse goals outlined in our Revitalization Plans, tackling environmental challenges associated with the highest priority sites within the target area. This approach will maximize grant value and trigger further environmental and reuse funding (IV.E.1.c.i). For example, plans are underway to redevelop the automotive junk yard site adjoining Pott's Ditch (Federally Designated Floodplain-Zone AE) into a recreation area, connected directly to Greenfield's Pennsy Trail greenway/trail system. The City has already made significant investment in the Trail project, acquiring some of the surrounding properties and drafting site plan scenarios. However, additional funding from an EPA grant is needed in order to complete the environmental due diligence and trigger redevelopment. As well, plans and work have already begun on Depot Park, which straddles the Pennsy Trail in the southern portion of the downtown. This former rail depot site will become the home of a new downtown park and civic amphitheater. Some assessment has already been performed, but more is likely necessary. The former grain elevator, power substation, and former towing yard sites will become desperately needed multi-family residential or mixed-use developments for low- to moderate-income families. The former gas station is slated to become part of a downtown convention center. EPA grant funding will fuel this aggressive revitalization effort creating needed jobs, affordable low- and moderate-income housing, and walkable greenspace within the target area, improving the quality of life in the PTC. Significant resources have already been pledged for the reuse of PTC properties as indicated in IV.E.1.c.i, and with EPA funds to cover environmental costs, we will make the outcomes outlined below a reality. IV.E.1.b.ii Outcomes & Benefits of Reuse Strategy: Brownfield assessments will be linked to successful reuse outcomes, creating equitable, affordable housing; improving the economic competitiveness of our target area; leveraging current and future investments; and creating unique, healthy, safe, and walkable neighborhoods. This will be accomplished in the PTC, where the largest number of low-income, minority, and other sensitive populations reside, supporting environmental justice goals. Reuse of brownfields will generate higher tax revenue for the City, and through increased investment, jobs will be created, new residential units will be constructed, and property values will be enhanced. Reuse of all the priority sites listed in IV.E.1.a.ii, has potential to create over 100 jobs and generate an estimated \$80K in annual income tax revenue. Additionally, since this target area is in a designated Tax Increment Financing (TIF) district, incremental increases in property taxes will be retained for redevelopment purposes by the City. By our calculations, this could generate up to \$300K in annual incremental tax revenue which will be reinvested in the PTC. For example, reuse of the former towing yard site will remove the threat associated with environmental contamination (petroleum, metals, PCBs, VOCs, PAHs, etc.) and blight will be eliminated, reducing crime that the abandoned property encourages. Temporary jobs to construct, remediate, and reuse the site, as well as permanent jobs to operate the planned multifamily residential housing will be created, stimulating other area investment from the private sector. During all phases of the revitalization process, we will promote and encourage the use of energy efficient measures in the reuse of the priority brownfield sites, including implementing building codes that require or promote energy efficiency measures such as solar street lighting, energy efficient lighting, low-flow showers/toilets. Residents will benefit from increased property value or may seek housing with energy efficiency and less maintenance costs. As target area brownfields are reused, historical employment and revenue losses will be reversed, and the PTC will again become vibrant. Although Greenfield does not have a federally designated Opportunity Zone, the PTC meets most of the low-income criteria (high poverty and low MHI) by which Opportunity Zones are determined.

IV.E.1.c. Strategy for Leveraging Resources, i. Resources Needed for Site Reuse: Our City has a history of leveraging investment in projects throughout the community. For example, underutilized former Center Street Shoppes was recently redeveloped just this year into the desperately needed Broadway Flats, a 54-unit entrepreneur apartment complex, costing over \$8.5M to build (including \$100K from the

City for infrastructure upgrades). More investment is planned, focusing on the PTC. Without EPA funding for the initial high-risk environmental assessment of these sites, brownfield revitalization will stagnate. Greenfield will pursue many different funding sources from the state and federal levels, as well as the private sector to use as leveraging as outlined below.

- Core Redevelopment will construct mixed-use development in PTC (100 unit apts./7K ft² retail) (\$1M committed)
- Stellar Designation Funds funds for economic development projects (e.g. PTC improvements, Grain Elevator site renovation, etc.) (\$2.25M)
- Stellar Designation Local Match Commitment match for projects along or near the Pennsy Trail over the next 4 years (up to \$3.5 million)
- Stellar Endowment Fund community collaboration fund from private donations for economic development projects (\$250K)
- City of Greenfield Tax Increment Financing will be used for infrastructure improvement, such as sidewalks, water lines, sanitary sewer upgrades, roads, etc. (up to \$20K to redevelop the PTC)
- *EPA* Additional EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) to further the brownfield reuse goals of the City (\$300K-\$1M)
- Federal Highway Administration Infrastructure improvements like streets & pedestrian/bicycle pathways (Est. \$5M+)
- *Indiana Economic Development Corp.* Tax credits & other incentives to help communities create a climate where pressures from taxes, investment costs, & red tape are lower (Est. \$1M+)
- *Indiana Brownfields Program* Low-interest/partially forgivable loans for brownfield investigation and cleanup through the EPA-funded Revolving Loan Fund (Est. \$1M)
- *Indiana Finance Authority* SRF funding generated from an interest rate discount on wastewater improvement project loans. The savings realized through the rate reduction can be used to remediate brownfield sites (\$500K+)
- *Indiana Brownfields Program* Section 128A funding may be used to complete the investigation of sites identified and partially assessed in this Grant (est. \$75K)
- Excess Liability Trust Fund State insurance funding for investigating and remediating eligible petroleum contaminated sites with underground storage tanks (up to \$2M)
- *Private Funding* to remediate sites ineligible for state/federal funding. Such sites may need encouragement and reuse support from the City to conduct necessary clean-up prior to reuse (unlimited)
- Liability Insurance Funding Indiana courts have ruled that historical general liability policies must cover assessment and remediation costs on sites known to be contaminated. Using EPA Assessment Grant funding to demonstrate the presence of contamination will help trigger viable liability insurance policies to fund cleanup of environmental damages. The City will make efforts to apply this funding source to all eligible sites, including privately and municipally owned property (often \$1-3M/site). Insurance coupled with EPA assessment funding has been used on brownfields in many communities in Indiana (e.g. Plymouth, Logansport, Jeffersonville), commonly leveraging hundreds of thousands, or even millions in assessment and cleanup funding.

A detailed funding plan will be developed for brownfield sites/areas as assessment projects progress, and each site will have a unique funding plan due to individual status and eligibility.

IV.E.1.c.ii. Use of Existing Infrastructure: Greenfield's Revitalization Plans' land use goals emphasize the build-out of existing parcels, and rehabilitation and infill development in our city's traditional core neighborhoods before additional land is considered for development. Modern utility infrastructure is present in all of the target areas (3-phase electricity, natural gas, city water and sewer, telephone and fiber optic service), providing connectivity to new development. It is robust enough to handle the added capacity required by any planned reuse and will utilize existing services and other infrastructure (roads, curb cuts, on/off-street parking, & nearby utilities) to attract new investment in area brownfields, reducing site reuse costs. With revitalization ranging from residential to industrial, existing infrastructure will allow for easy access for commercial/industrial development, enabling residents the opportunity to work and live in the same neighborhood, creating a walkable community. Traditional transportation infrastructure will be complemented by

pedestrian connectivity, bicycle improvements, and universal accessibility. For example, the former rail depot, grain elevator property, gas station, and junkyard sites are sited directly adjoining the existing Pennsy Trail and revitalization of these sites will link them directly with each other and surrounding neighborhoods. Additional roads or trails necessary for planned reuse will be sought from the US Dept. of Transportation Better Utilizing Investments to Leverage Development (BUILD) Grant program. If additional infrastructure is needed, we will utilize a combination of local funds (when available) and CDBG funds to meet the development's infrastructure needs.

IV.E.2. Community Need and Community Engagement, a. Community Need, i. The Community's **Need for Funding:** The City of Greenfield needs US EPA's financial assistance because we do not have the necessary funds in our general budget (estimated \$20M for 2020) to address brownfields anywhere in our community, let alone in our target area. Indicators of need in the PTC is evident in numerous key economic and demographic factors: Unemployment is higher (7%) (2017 ACS) than the US (3.3%) state (2.8%), and City (2.8%) (Bureau of Labor Statistics (BLS) 11/19), and Median Household Income (MHI) (\$34,975) is significantly less than US (\$57,652) and state (\$52,182) and has actually decreased by 6% for PTC residents since 2010, resulting in a greater percentage of persons living in poverty in our target area (17%), which is greater than the US and state (14.6%), or the City (12.9%). This is especially true for our children and elderly (with 24% and 14% respectively) living in poverty vs. the US (20.3%) & 9.3%), state (20.4% & 7.5%), and City (21.4% & 5.3%) respectively (all stats from 2017 ACS unless otherwise noted). Low income combined with the large number of vacant buildings on brownfields has resulted in an overall increase in crime within the PTC, which according to City officials, is more than two times higher than in the City as a whole, and especially violent crimes, which increased over 700% in the City from 2013 to 2017 (FBI's Offenses Known to Law Enforcement). Reduced income tax revenues due to the loss of large, high paying employers such as those listed in IV.E.1.a.i further limit local government resources, and priority brownfield sites listed in IV.E.1.a.ii add to the financial burden of target area residents by suppressing residential property values and adding to municipal expenditures through reduced tax base, and additional public safety services to brownfield sites due to criminal activity.

Finally, Greenfield is suffering a significant shortage of quality low- and moderate-income housing for our growing population, with over 97% of our available housing stocks currently occupied. The reuse goals for most of Greenfield's priority brownfield sites in IV.E.1.a.ii is to create more affordable housing, additional park and trail green space, and a convention center in the PTC areas. All these issues highlight the simple truth that with a budget barely able to provide essential services and much-needed infrastructure maintenance, we lack the discretionary funds necessary to complete the proactive assessment and planning activities that this grant will provide, including clarifying environmental issues on brownfield sites, encouraging developers to seek out and invest in them, and eliminating the risk to the health and wellbeing of our residents and environment. Ultimately, this EPA grant will allow Greenfield to realize fulfill our revitalization needs for our target area, including creating more affordable housing; re-establishing lost industry, improving economic competitiveness of the target area; and creating unique, healthy, safe, and walkable neighborhoods.

IV.E.2.a.ii. Threats to Sensitive Populations, (1) Health or Welfare of Sensitive Populations: Because many of our target area brownfields are near sensitive populations (low-income residents, children and elderly residents below poverty level, and a preschool), brownfields have likely adversely impacted their health. They are often unsecured and trespassers, including children, risk exposure to toxic chemicals, asbestos, unsafe structures, and leaking underground storage tanks causing soil and groundwater contamination. Contaminants such as metals, petroleum, VOCs, SVOCs, PAHs, PCBs, glycols, lead paint, and asbestos are potentially causing unknown harm. For example, the junk yard priority site, located near a low-income neighborhood, is potentially impacted with petroleum, metals, VOCs, and other contaminants that are known to cause various cancers, and chronic liver disease, both of which are experienced by Greenfield residents at a higher rate than the state and nation (IV.E.2.a.ii(2)). The proximity of such a large number of brownfields to low-income neighborhoods in our PTC drives down housing values, suppresses commercial investment, and limits residents' access to adequate employment, resulting in a distinct disadvantage to target area residents with no real relief in sight.

An infusion of funding from this EPA grant will provide needed capital for the assessment of these blighted properties, clearing the way for remediation and revitalization of the PTC to include much

needed low- and moderate-income housing, increased green space, and connectivity through our growing trail system. The resulting resurgence of commerce will support new and revitalized local retail businesses which in turn will boost local employment with quality diversified jobs. Redeveloping our brownfields will increase tax revenues which will directly benefit Greenfield's underserved and sensitive populations, including removal of blight, lower crime, safer neighborhoods, and access to better public services. This will help our community to understand environmental conditions at our brownfields, reducing the risk of exposure, eliminating sources of contamination, improving the health of our community, and reducing environmental justice disparities within our underserved and sensitive populations.

IV.E.2.a.ii(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Contaminants from target area brownfields are affecting our residents' health. Many of the priority sites are believed to be impacted by PCBs, VOCs, petroleum, metals, asbestos, lead paint, etc. Studies on the health effects of exposure to these contaminants has been linked to higher incidences of cancer, thyroid conditions, and liver issues. Incidences of all cancers in Hancock County (487/100K) exceed that of Indiana (467/100K), as well as chronic liver disease (Hancock County (12.9/100K) vs. Indiana (11.6/100K)). Contaminants in the air from coal-fired power generation, congestive highway traffic, and nearby heavy urban industry, have affected residents' health. There are over 482 Greenfield properties with environmental records on the Indiana Department of Environmental Management's Database, the cumulative effects of which likely contribute to the adverse health conditions impacting our residents. According to countyhealthrankings.org (2017) Hancock County ranks 70th worst of the 3,142 US counties (4th among Indiana's 92 counties) for air pollution-particulate matter in 2017. According to the ISDH (2016) Stats Explorer, the incidences of death from chronic lower respiratory diseases in Hancock County (63.3/100K) exceeds that of Indiana (55.2/100K). Finally, reduced access to and a reduced ability to pay for healthcare means that low-income and minority patients are less likely to receive recommended health care services (Urban Institute/Center on Society and Health - 2015), thus they are more likely to experience negative health effects from exposure to brownfield contaminants, again raising environmental justice issues. Though not available at the municipal level, this data is believed to be representative of our target area due to the large number of economically vulnerable people living there.

Removal of the sources of environmental contaminants present at brownfields in our community will reduce the exposure of our disadvantaged populations to these materials. This in turn will help to reduce the disproportionate incidences of disease and other poor health outcomes that these residents are currently experiencing. The first step is assessment of the environmental conditions of target area priority brownfields. However, the City simply does not have the funds available to invest in brownfields assessment at this time. Funding from this EPA assessment grant will initiate the revitalization of our PTC and downtown area by providing that initial infusion of capital to clarify the environmental condition of target area brownfields, reducing the hesitation of developers to invest in our vision for our community. The subsequent reuse and transformation of target area brownfields into productive residential, commercial, and recreational properties will result in more high-quality jobs, a higher tax base, less crime, and better overall health for the community.

IV.E.2.a.ii(3) Disproportionately Impacted Populations:

The public health impact from our target area brownfield properties and industrial operations, and their proximity to our sensitive populations, including impoverished and minority residents, has disproportionately exposed them to environmental pollutants, resulting in an inability to maintain their health and wellbeing, improve their condition, or even move away due to their financial situation, raising significant environmental justice issues. Per the Urban Institute/Center on Society and Health (2015), low-income residents become sick more frequently and more quickly, and die at younger ages on average than those in more affluent communities. Children living in poverty are 4 times more likely to be in poor or fair health than children in high-income households, and they experience higher rates of asthma, heart conditions, hearing problems, digestive disorders, and elevated blood lead levels. The high unemployment (7%), high poverty rate (17%), and low MHI (\$34,975) in the PTC are significant when compared to US, state, and City figures. In addition, a large portion of Greenfield's small but growing minority population is concentrated in the target area, putting them at higher risk from the effects of contaminants from years of industrial activity and the corresponding decline in the quality of life. Add in high commercial property vacancy rates and the associated increase in crime and it is easy to see that our

impoverished and minority residents are at a distinct disadvantage, resulting in significant environmental justice concerns.

Funding from an EPA grant will improve the economic status and health of disadvantaged residents by identifying the environmental conditions of area brownfields, generating interest in these properties from developers, and stimulating leveraged funds to remediate and redevelop the sites, thereby reducing or removing the threats from contaminants. New businesses created will provide employment for residents, increased tax base for the City, and an overall more vibrant economy for our future.

IV.E.2.b. Community Engagement, i. Project Partners & ii. Project Partner Roles: Several community-based organizations have pledged supporting roles for the City's brownfields program and grant (Table 2). This diverse assemblage of community groups can engage the community at a grassroots level. They have regional influence and local ties, maximizing the benefits they bring to the project.

Table 2 – Project Partners

Partner Name	Point of Contact	Specific Role in the Project
Hancock County	Jim Shelby, Councilman, aol.com,	Provide project planning, project funding, government project liaison, provide meeting space, dissemination of information
Hancock County Community Foundation	Mary Gibble, Director, mgibble@givehcgrowhc.org, 317-462-8870	Provide project planning, project funding, community project liaison, provide meeting space
Hancock County Economic Development Council	Randy Sorrell, Director, rsorrell@hancockedc.com, 317-477-7241	Provide planning, local industry and state economic development liaison, encourage stakeholder involvement, seek resources for leveraging reuse efforts
Greenfield Area Chamber of Commerce	Retta Livengood, Director rlivengood@greenfieldcc.org, 317-477-4188	Provide meeting facilities, expertise to educate the public on brownfields & benefits of reuse, dissemination of information
Greenfield Main Street Inc.	Shelley Swift, Director shelley@greenfieldmainstreet.org, 317-649-0890	Provide planning, downtown merchant & community liaison, façade grant funding

IV.E.2.b.iii. Incorporating Community Input: Greenfield has a culture of community involvement that we will maintain throughout this grant. A community engagement event was held on 11/13/19 to solicit input on reuse, site access, and other brownfields issues. 4 to 6 public meetings will be held throughout the grant period to maintain stakeholder engagement and continue to gather public input on site selection and prioritization, assessment needs, cleanup decisions, and reuse planning. Public meetings will be advertised through municipal and partner websites, local papers, radio, and social media platforms (earned media and other low-cost, no-cost or in-kind methods) ensuring that the entire community has an opportunity to provide input. The City has multi-lingual personnel available to advertise meetings, interpret presentations, or translate documents in Spanish or other languages as needed. A public meeting will be held in the first two quarters of the grant period to discuss the goals of the grant, initial planned activities, and a schedule for future community involvement. For subsequent meetings, personal invitations will be sent to residents directly impacted by priority sites, neighborhood groups, lenders, area businesses, and developers to maximize the engagement of these stakeholders. Regional developers will be contacted through the City, Planning Commission, and Chamber of Commerce to bring awareness of the redevelopment opportunities priority sites offer. When developers are identified, they too will attend public meetings to describe their plans for reuse. Stakeholder input will be cataloged to determine assessment and reuse priorities. As the project progresses, we will actively involve target area stakeholders in the decision-making process regarding site prioritization, assessment, site marketing, cleanup planning, and feedback on site reuse. As appropriate, we will utilize visioning sessions offered by the Kansas State TAB program to maximize the incorporation of community input.

IV.E.3. Task Descriptions, Cost Estimates, & Measuring Progress, a. Description of Tasks/Activities & Outputs: The City will begin grant-related activities immediately upon award confirmation, working to prepare a Work Plan approved by the EPA Project Manager. Once the Work Plan is approved, we will select a Qualified Environmental Professional (QEP) in accordance with federal procurement regulations (2 CFR 200.317 - 200.326). The City has begun developing a brownfield inventory to use as a tool to help accomplish reuse goals. Inventoried sites are prioritized based on the following criteria, in no particular order: 1) reuse potential, 2) potential for environmental or human health impact and environmental justice, and 3) community input. Brownfield revitalization progress will be tracked with

regular entries into ACRES, public meetings, and coordination with the QEP. Greenfield and its QEP will complete the following tasks:

Task / Activity 1: Program Management, Training Support, Brownfield Inventory/Prioritization

i. Project Implementation: City staff will travel to regional and national brownfields conferences/meetings, participate in calls, meetings, and correspondence between the City, QEP, EPA, etc. to manage the grant's cooperative agreement. ACRES database will be updated quarterly or more frequently if needed. We will carefully track contractor costs, comparing to the budget, expenditures, and project progress. This will ensure that grant funds will be successfully utilized within the prescribed three-year project period. The City, with QEP support, will also update/prioritize the inventory under this task. ii. Anticipated Project Schedule: QEP selected through a competitive bidding process before Cooperative Agreement period begins; correspondence will occur at least monthly (more frequently as specific project activities require) throughout the grant period; update and prioritize brownfield inventory the first 2 quarters, then as necessary for the remainder of the grant period; ACRES updates will be conducted at least quarterly throughout the grant period

iii. Task/activity Lead(s): City & QEP

iv. Output(s): Travel - City staff to regional and national brownfields conferences/meetings; prioritized inventory; project performance reports: Quarterly Reports, ACRES Entries, DBE reports, annual reports, etc.; calls, meetings, and correspondence between the City, QEP, EPA, etc. to manage the grant's cooperative agreement.

Task/Activity 2: Env. Investigation

- i. Project Implementation: Eligibility determinations will be completed under this task; The QEP will complete Phase I ESAs activities on sites selected by the City. All Phase I ESAs will be conducted by/in accordance with the ASTM standard for Phase I ESAs (E1527-13) and the All Appropriate Inquiry (AAI) rule. Areas of focus will include those already determined in the inventories as priority sites listed in Table 1; The QEP will prepare a Quality Assurance Project Plan (QAPP) which must be approved by the EPA. Once approved, the QEP, directed by the City, will complete Phase II ESAs (after the completion and EPA approval of the Sampling & Analysis Plan/Health & Safety Plan (SAP/HASP) based on environmental conditions identified in the preceding Phase I ESAs.
- *ii.* Anticipated Project Schedule: Request eligibility determinations & finalize site access to initial sites for investigation-early 2nd Quarter of Grant period; Begin Phase I ESAs-2nd Quarter of Grant period; Submit QAPP to EPA for review/approval; QAPP approval & Phase II ESAs begin-3rd Quarter of Grant period; all Phase I ESAs completed-end of 11th Quarter of Grant period; all Phase II ESAs completed, and final contractor invoices submitted-45 days before end of grant period.

iii. Task/activity Lead(s): City & QEP

iv. Output(s): 5-6 Phase I ESAs each for haz. substance and petroleum impacted sites; Quality Assurance Project Plan (QAPP), estimated 3-5 Phase II ESAs each for hazardous substances and petroleum impacted sites.

Task/Activity 3: Clean-up Planning:

- *i. Project Implementation*: The QEP, directed by the City, will prepare site specific clean-up plans/documents, including: Analysis of Brownfield Cleanup Alternatives, remediation plans, site closure letter requests, and clean-up funding development (IV.E.1.c.i).
- ii. Anticipated Project Schedule: throughout the grant period

iii. Task/activity Lead(s): QEP

iv. Output(s): 5-10 cleanup planning documents

<u>Task/Activity 4: Community Outreach & Involvement:</u>

- i. Project Implementation: 4-6 public meetings will be held during the grant period to update the community on brownfield assessment progress and seek public input/involvement. Print and mail material for project/site information and marketing documents may also be funded under this task. The City will complete this task, assisted by the QEP, who will manage the technical aspects of the community outreach program. Social media outlets and other online media will be developed/maintained, and outreach efforts will inform the public on the progress of brownfield investigation/cleanup planning activities and provide marketing resources for future development.
- *ii.* Anticipated Project Schedule: 1st outreach meeting planned for 2nd Quarter of grant period, remaining outreach events planned throughout the rest of the grant period.

iii. Task/activity Lead(s): City & QEP

iv. Output(s): 4-6 public meetings to update the community on the brownfield assessment progress and seek public input and involvement; supplies: printed flyers, advertising, postage, etc.

We will work diligently to assure startup activities are completed per the schedule above. The City will allocate all grant funds to project properties before the final quarter of the grant period to assure that grant task activities are completed before the end of the cooperative agreement contract. The Cooperative Agreement period is 3 years, however, because there is an extremely high demand for assessments and site access has already been obtained for some of the highest priority sites in IV.E.1.a.ii (e.g., Depot Park), it is likely that funds will be spent prior to the end date. If activities occur beyond the priority sites, they will occur after the inventory and prioritization is finalized (early 2nd quarter as indicated above). We are proactively communicating with representatives of privately-owned brownfields to gain access and resolve issues in anticipation of this grant funding as well as non-grant funded assessment activities. Such communication initiates the process for eventual property transfer and reuse, and create a positive dialog between property owners, local government, and impacted citizens. Prior to applying for site eligibility under the grant, an access agreement will be prepared and executed for each site being considered.

<u>IV.E.3.b.</u> Cost <u>Estimates</u>: The City will allocate \$242,300 to Phase I and II ESAs (or 81% of total grant funding assigned to ESAs). The costs outlined in Table 3 were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in IV.E.1.a.ii.

Table 3 Budget	Budget Categories ¹	1. Program Mgmt & Training Support	2. Brownfield Inv/Prioritization, Phase I/II ESAs	3. Clean-up Planning	4. Community Outreach & Involvement	Category Total
25556	Travel	\$1,800			at, or product	\$1,800
Haz	Supplies	3. 35				\$120
				\$18,000		\$178,080
	Subtotal (Haz)	\$9,000	\$145,380	\$18,000		\$180,000
		\$1,200		3	S 16.	\$1,200
Petro	Supplies	- Z ₂	20			\$80
a a	Contractual ²	\$4,800	\$96,920	\$12,000	\$5,000	\$118,720
	Subtotal (Pet)			\$12,000		\$120,000
TOTAL B	UDGET	\$15,000	\$242,300	\$30,000	\$12,700	\$300,000

 1 Only budget categories with costs in Table. 2 In accordance with Federal, State, and local procurement regulations.

The costs outlined in Table 3 above were developed anticipating tasks necessary to efficiently identify, characterize, and plan for the remediation of the priority sites listed in IV.E.1.a.ii. Grant tasks will be completed at the anticipated costs per unit with the following anticipated outputs/outcomes:

- 1. Program Management & Training Support, Inventory/Prioritization \$15,000 (\$9,000 for haz. substances, \$6,000 for petroleum) *Travel*: Attend National Brownfield Conf.): airfare x 2 @ \$1,000, 2 rooms, 3 nights lodging @ \$1,400, meals @ \$450, ground transportation @ \$150 = \$3,000), *Contractual*: total \$12,000, includes approximately 104 hrs. \$77/hr. = \$8,000 for inventory, and approximately 52 hours \$77/hr = \$4,000 for program management. In addition, existing funds supporting City staff (\$8,000) will be offered in-kind for this task.
- 2. Env. Investigation \$242,300 (\$145,380 for haz. substances and \$96,920 for petroleum) Contractual: 11 Phase I ESAs at an average cost of \$3,500 each= \$38,500, & 6-10 Phase II ESAs at an estimated cost of \$20,000-\$40,000 (depending site complexity/environmental conditions) = \$203,800. Though our budget will support 11 Phase I's and 6-10 Phase II ESAs, we understand that large sites may need more investment requiring us to realign the budget during the grant period. Areas of focus will include those already determined in the inventories as priority sites listed in IV.E.1.a.ii.
- 3. Clean-up Planning: \$30,000 (\$18,000 for haz. substances and \$12,000 for petroleum) Contractual: 5-10 ABCAs/clean-up plans expected to cost \$3,000-\$6,000 each = \$30,000.
- 4. Community Outreach & Involvement: \$12,700 (\$7,620 for haz. substances and \$5,080 for petroleum) Supplies: printed flyers, advertising, grant fact sheets, outreach visual aids, advertising, postage, etc. = \$200, Contractual: approx. 162 hours over three years at an estimated \$77/hr = \$12,500. IV.E.3.c. Measuring Environmental Results: Tracking, measuring, and evaluating progress will be achieved through meeting minutes, Quarterly and Annual Financial Reports, quarterly review/analysis of any grant performance encountered/identified in Quarterly Reports, and completion of Work Plan tasks. If planned outputs/outcomes are not achieved or milestones/project schedule outlined in IV.E.3.a

are not being met, we will create a corrective action plan to identify deficiencies and make the appropriate adjustments necessary to achieve the anticipated outputs on schedule. Further, the Assessment Grant will have the following measurable outcomes: sites/acreage assessed, jobs created/retained, redevelopment complete, number of parcels, acreage made ready for greenspace/recreation, and leveraged monies. These and other statistics will be included in Quarterly Reports and ACRES submittals as data becomes available, which will allow the EPA to better evaluate and highlight the grant program success At the close of the project, the City will provide a final report to the EPA and our residents summarizing project outputs and outcomes.

IV.E.4. Programmatic Capability & Past Performance, a. Programmatic Capacity, i. Organizational Structure & ii Description of Key Staff: The City's Engineering & Planning Department will manage this grant. This office has managed many economic development resources valued at well over \$30M over the past 10 years. The Engineering & Planning Department staff, along with other city staff, have the technical, financial, and administrative ability and systems in place to implement this grant project successfully. In the unlikely event that a member of the team leaves their job prior to the completion of grant tasks, the depth of the City's team will allow for a seamless transition to other experienced members. Ms. Joan Fitzwater, City Planning Director, will serve as the City's Project Manager. Ms. Fitzwater is a nationally certified public manager through Ball State and has 16 years of experience in municipal planning and 17 years in private sector land development. Since her tenure in Greenfield, Ms. Fitzwater has been integral to the progress made to redevelop brownfields. Ms. Fitzwater will be assisted by Ms. Jenna Wertman, Associate Planner. Ms. Wertman is an AICP certified planner through the American Planning Association, and has worked for the City for 4 years, and Indiana Housing and Community Development for 1 year. Both Fitzwater and Wertman will aggressively use their previous brownfield reuse and planning experience to seek redevelopment opportunities for those sites without secured reuse contracts. Ms. Lori Elmore, Greenfield Clerk-Treasurer, will serve as the Grant Financial Manager and will be responsible for accounting and financial reporting. She has provided these services on other grant and loan programs benefiting the City. Mr. Jason Koch, City Engineer, has 17 years of experience and will assist in technical matters and help leverage other federal and state funding.

IV.E.4.a.iii. Acquiring Additional Resources: City staff has a history of working cooperatively with state and federal environmental agencies and procuring contractors including QEPs. Through a competitive bidding and procurement process, the City will select a QEP and consulting firm experienced in administering EPA Brownfields Grants and working with Indiana Department of Environmental Management/Indiana Brownfields Program (IDEM/IBP). The team and execution plan outlined above will ensure timely and successful expenditure of funds within the prescribed three-year project period. This team will be supported by other city departments including finance, utilities, engineering, the legal department, and the office of the Mayor.

IV.E.4.b. Past Performance & Accomplishments, ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (1) Purpose & Accomplishments: The City has never received an EPA Brownfields grant. However, we have received other Federal and non-Federal assistance agreements as indicated in Table 4.

Table 4 – Past Federally/Non-Federally Funded Assistance Agreements

Funding Source	Project	\$ Received	Outputs/Outcomes
OCRA Community	Main Street	\$500K	Renovated facades of 10 historic downtown buildings,
Development Block Grant	Revitalization	φουικ	leveraged \$200K in additional funding
Greenfield Main Street,	Downtown Façade	\$80K	Renovated facades of 70 historic downtown buildings,
Inc.	Improvement	•	generating \$1M private investment
Federal Highway	Main Street	\$782K	Streetscape and amenity enhancements of US 40/Main Street
Administration (FHWA)	Enhancements	φ102K	(National Road) from Pennsylvania Street to Spring Street

IV.E.4.b.ii(2) Compliance with Grant Requirements: All funding assistance agreement terms and conditions were met for the above projects, including reporting the number of façade improvements completed; financial reports; quarterly progress reports; and final reports. All grant goals and outputs/outcomes (indicated in Table 4) were achieved, and all reports were completed in a timely manner. The City was fully compliant with the terms and conditions of these grant programs. 100% of the OCRA CDBG and FHWA grants have been expended, and the Greenfield Main St. grant is ongoing. For all grants, Greenfield is in compliance with all reporting and performance protocols.

III.B. Threshold Criteria for Assessment Grants

III.B.1 Applicant Eligibility

The Municipality of Greenfield meets the definition of a Local Government under 2 CFR 200.64 and is a political subdivision of the State of Indiana. It is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

III.B.2 Community Involvement

Involving our community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to our community's Brownfields program's success. Communication is a two-way process, and our ultimate goal is to keep the community informed and involved so they remain aware of potential concerns, questions and solutions. Greenfield will utilize social media platforms, earned (free) media and other low-cost, no-cost or in-kind methods to engage the community, solicit public and stakeholder participation, and advertise public meetings. Regular public meetings have already been and will continue to be held to engage the public and encourage stakeholder and residents' participation in the EPA grant funded Brownfield activities. See Section IV.E.2.b. of the Narrative/Ranking Criteria for further information.

III.C. Expenditure of Assessment Grant Funds

This criterion is not applicable as Greenfield is not a current EPA Brownfields Assessment Grant recipient.

OMB Number: 4040-0004 Expiration Date: 12/31/2019

Application for F	Federal Assista	nce SF	-424							
* 1. Type of Submissi Preapplication	on:	* 2. Typ	pe of Application:	* If Re	evision, s	select appropria	te letter(s)	:		
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* 3. Date Received:		4. Appli	icant Identifier:							
12/03/2019										
5a. Federal Entity Ide	ntifier:			5b	o. Federa	al Award Identi	fier:			
State Use Only:										
6. Date Received by	State:		7. State Application	Ident	tifier:					
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Prefix: Ms.			* First Nam	e:	JOAN					
Middle Name:										
* Last Name: FIT	ZWATER									
Suffix:										
Title: PLANNING D	IRECTOR									
Organizational Affiliat	ion:									
* Telephone Number:	3173251329					Fax Number:				
* Email: JFITZWAT	'ER@GREENFIELD	IN.ORG								

Application for Federal Assistance SF-424
* 9. Type of Applicant 1: Select Applicant Type:
C: City or Township Government
Type of Applicant 2: Select Applicant Type:
Type of Applicant 3: Select Applicant Type:
* Other (specify):
* 10. Name of Federal Agency:
Environmental Protection Agency
11. Catalog of Federal Domestic Assistance Number:
66.818
CFDA Title:
Brownfields Assessment and Cleanup Cooperative Agreements
* 12. Funding Opportunity Number:
EPA-OLEM-OBLR-19-05
* Title:
FY20 GUIDELINES FOR BROWNFIELD ASSESSMENT GRANTS
13. Competition Identification Number:
Title:
14. Areas Affected by Project (Cities, Counties, States, etc.):
Add Attachment Delete Attachment View Attachment
* 15. Descriptive Title of Applicant's Project:
FY20 GREENFIELD EPA COMMUNITY WIDE BROWNFIELD ASSESSMENT GRANT FOR HAZARDOUS SUBSTANCES AND
PETROLEUM
Attach supporting documents as specified in agency instructions.
Add Attachments Delete Attachments View Attachments

Application	for Federal Assist	ance SF-424	
16. Congressi	onal Districts Of:		
* a. Applicant	IN-06		* b. Program/Project IN-05
Attach an additi	onal list of Program/Proj	ect Congressional District	ts if needed.
			Add Attachment Delete Attachment View Attachment
17. Proposed	Project:		
* a. Start Date:	10/01/2020		* b. End Date: 09/30/2023
18. Estimated	Funding (\$):		
* a. Federal		300,000.00	
* b. Applicant		0.00	
* c. State		0.00	
* d. Local		0.00	
* e. Other		0.00	
* f. Program In	come	0.00	
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